

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MICHAEL BROWN, SR., AND LESLEY	)	
McSPADDEN,	)	
	)	
Plaintiffs,	)	
	)	Cause No: 4:15-cv-00831-ERW
vs.	)	
	)	
CITY OF FERGUSON, MISSOURI,	)	<b>JURY TRIAL DEMANDED</b>
FORMER POLICE CHIEF THOMAS	)	
JACKSON, AND FORMER POLICE	)	
OFFICER DARREN WILSON,	)	
	)	
Defendants.	)	

***DEFENDANTS' SECOND REQUEST FOR PRODUCTION TO  
PLAINTIFF LESLEY MCSPADDEN***

COME NOW, Defendants, City of Ferguson, Missouri, Former Police Chief Thomas Jackson, and Former Police Officer Darren Wilson, and for their Second Request for Production to Leslie McSpadden, state:

45. Please produce (or allow for inspection pursuant to F.R.C.P. 34) all accounts of Michael O.D. Brown identified in your Answer to Interrogatory 47, and all accounts of yours identified in your Answer to Interrogatory 47 pertaining to your allegations in the Complaint (and any amendments thereto).

**RESPONSE:**

46. Please produce all documentation (including without limitation notes, letters, e-mails, correspondence, voice messages, text messages, drafts, etc.) exchanged between you and any individual assisting in the process of releasing your book "Tell the Truth & Shame the Devil" (including Lyah Beth LeFlore, any assistants with publishing and editing, etc.).

**RESPONSE:**

/s/Peter J. Dunne

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A copy of the foregoing was emailed on this 27<sup>th</sup> day of June, 2016, to:

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/s/ Peter J. Dunne

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